

Triennial Review Basin Plan Text and Format Issues (Un-prioritized)

Draft dated 7/19/10

This is a list of Basin Plan text and format changes that have been suggested by staff and the public over time. The suggested changes have not been prioritized or evaluated to determine if they are appropriate. As Basin Plan amendments are processed, staff will use this list to correct or improve the relevant sections. When a full update of the Basin Plan occurs, this list will be used as a starting point. Suggested revisions to Basin Plan water quality standards are on a separate list titled, "Triennial Review Basin Planning Issues."

A. General

1. Number the parts, sections, subsections, etc. (e.g., so one could refer to subsection 1.A.i.a)
2. Move the Implementation chapter after the Plans and Policies chapter since the Implementation chapter should be about, among other things, implementing applicable plans and policies.
3. Add links in the on-line version, especially to statutes, regulations, plans, policies, resolutions, and orders.
4. Move TMDLs out of chapters into appendices.
5. Put Basin Plan version number or date on footer so you know if you have the current version.
6. Incorporate by reference things done by other agencies (e.g., endangered species act, State Board, MCLs).
7. Take out some of the more specific or more detailed information from the Basin Plan. Some of the information in the Basin Plan is more specific or more detailed than necessary (e.g., the number of certain types of facilities or permits and/or the owners/operators of certain facilities - all of which can and do change). Such details should be left out of the Basin Plan to avoid having information in the Basin Plan that is out-of-date. It would be better to have less information, all of which is correct, up-to-date, and complete, than to have more information, some of which is incorrect, out-of-date, or incomplete.
8. The Basin should be reviewed and revised to ensure that it is well organized, clear, easy to use, and easy to understand. The Basin Plan should be arranged and written so that different readers (Board members, staff, dischargers, environmental scientists, geologists, engineers, attorneys, etc.) are all likely to reach the same conclusion about what the Basin Plan says and means and are all likely to be able to find all the information in the Basin Plan that is pertinent to a particular topic. Information pertinent to a particular topic should be consolidated into fewer different places in the Basin Plan. Cross references, links, and a

good index would all help readers find other information pertinent to a particular topic where such information is in different places in the Basin Plan.

9. Replace the current big map with one that gives primary emphasis to water features and hydrologic boundaries.

B. Chapter 1 Introduction

1. Update and revise Chapter 1 of the Basin Plan to improve utility and reflect current conditions, priorities and regulations applicable to the San Diego Region.
2. Update Table 1-1 "Population Projections...." The first year in the table is prior to the 1994 date of the Basin Plan; only one year in the table is a projection beyond the current date of 2010. The source of population figures (projected and historical) needs to be cited. Consider rounding off population figures (45,344,961....). Add population projections for years beyond 2015. Add past population figures because past and projected population figures help explain the demands for and stresses on beneficial uses of waters in the region and the state as a whole and the need to protect and restore Beneficial Uses.
3. Update the descriptions of the region, the Hydrologic Units, and the waters. Descriptions are out-of-date, incomplete, incorrect, and/or otherwise need improvement.
4. Make the following changes to the Basin Plan Amendment Process section:
 - a. Change "A proposed standard revision to a statewide plan or..." to "A proposed revision of a standard in a statewide plan or...."
 - b. Change "If the standard revision is disapproved...." to "If a proposed revision of a standard is disapproved...."
 - c. In (12)(c): change "growth" to "outgrowth" (e.g., see (12)(b))
 - d. In endnote 9 - identify the source of the definition (or simply say "BMPs are....")
5. Reword the section on function of the Basin Plan to remove the discussion of the Regional Board's goal to achieve balance between competing needs of mankind for water of varying quality. (p. 1-1)
6. Add definitions for Ocean waters, Enclosed Bays and Estuaries, Coastal Lagoons.

C. Chapter 2 Beneficial Uses

1. Clarify the exceptions to the "Sources of Drinking Water" Policy. SWRCB Resolution No. 88-63 required all waters of the State to be designated with the MUN beneficial use unless they met certain criteria for an exception. The Regional Water Board has identified these waters which are exempt from the MUN beneficial use with a + in the Basin Plan beneficial use tables. The Basin Plan clearly states that although these waters are not protected for the MUN beneficial use and other associated water quality objectives, they are still protected

under other beneficial uses and water quality objectives as well as the antidegradation policy and other environmental laws and regulations.

2. Clarify and improve the beneficial use designations for stream systems labeled Inland Surface Waters in the Basin Plan as follows: (A) add figure(s) / diagram(s) showing interconnections between main stream and tributaries and between HUs, HAs & HSAs, (B) add a table of alphabetically listed stream names in addition to the current table listed by HUs/HAs/HSAs, (C) consider deleting stream names and simply identifying BUs by HAS, and (D) match nomenclature between map and tables.
3. Under Beneficial Use Designation under the Porter-Cologne Water Quality Control Act, the language in number (6) does not accurately reflect the state constitution. Change "...the constitutional prohibition of waste and unreasonable waste of water." to "...the constitutional prohibition of waste and unreasonable use of water."
4. In Table 2-1, list species by habitat (e.g., put the whales together) and change "habitat remarks" to "habitat."
5. Under the text for Inland Surface Waters, add a subheading with the text for Reservoirs and Lakes since they are also inland surface waters and put text specific to streams under a new subheading of "Stream Systems." Also, change "PRO" to "PROC" in the text.
6. Under the text for Ocean Waters, indicate how far offshore waters of the state extend and from what line (MLLW, MHHW, or other)
7. Under Coastal Waters, reorganize and add / revise text as needed to point out and clarify overlap between, common features of, and distinctions between stream mouths, estuaries, lagoons, enclosed bays, and harbors in the San Diego Region (e.g., based on tidal exchange, salinity, navigability of mouth, etc.; both bays are estuaries; not all estuaries are bays; all lagoons are estuaries; not all estuaries are lagoons, etc.). Add text saying that names are not necessarily descriptive and/or do not necessarily enable appropriate categorization. Clarify definition of Coastal Waters and what beneficial uses and objectives apply so it is clear that the Ocean Plan does not apply to San Diego Bay.
8. Rearrange list of bays and harbors and HSAs from North to South in Coastal Waters table. Change the name from Mouth of San Diego River to San Diego River Estuary.
9. Under Enclosed Bays, change the title to "Enclosed Bays and Harbors" and revise text accordingly. Note that San Diego Bay and Mission Bay were natural bays (and natural estuaries) with extensive anthropogenic modifications. In contrast, Dana Point Harbor, Del Mar Boat Basin, and Oceanside Harbor are entirely anthropogenic and were not natural bays. Revise the description because "enclosed bays are indentations along the coast" is not a good description of bays in the San Diego Region. The text should also note that San Diego Bay and Mission Bay are also estuaries.

10. Under Estuaries, change to “Estuaries, Lagoons, and Stream Mouths.” Add text to note that San Diego Bay and Mission Bay are estuaries as well as enclosed bays. In the first paragraph, change “Estuaries means waters....” to “Estuaries are waters....” In the second paragraph, change “Beneficial uses for these coastal waters provide habitat for” to “These coastal waters provide habitat for....” In the second paragraph, change “Coastal waters in the San Diego Region have as many as fourteen designated beneficial uses.” to “Coastal waters in the San Diego Region have many beneficial uses.”
11. Under Reservoirs and Lakes, change heading to something more generic and make this a subsection of “Inland Surface Waters.” It now is a separated from “Inland Surface Waters” by “Coastal Waters.” Refer to drinking water supply reservoirs generically and by name as reservoirs, not lakes. Add text to include all types of “standing” fresh water bodies in the San Diego Region such as drinking water supply reservoirs, reservoirs not used for drinking water supply, other artificial impoundments, natural (or formerly natural) lakes and ponds, vernal pools, etc. Consider identifying primary sources of water for all drinking water reservoirs, including inter-reservoir water transfers.
12. Under Ground Waters, the fourth paragraph, first sentence is unclear. Reword for clarity
13. Change title of Table 2-2, Beneficial Uses of Inland Surface Waters, to “Beneficial Uses of Stream Systems.”
14. Make the following changes to Table 2-2 for consistency and to correct spelling:
 - a. HSA 3.11: change “Mouth of San Luis Rey River” to “San Luis Rey River Mouth”
 - b. HSA 4.31: change “Agua Hedionda” to “Agua Hedionda Lagoon”
 - c. HA 6.10 : change “Carol Canyon” to “Carroll Canyon”
 - d. HSA 7.11: change “Mouth San Diego River” to “San Diego River Estuary and Famosa Slough and Channel”
 - e. HSA 8.31: change “Seventh St. Channel to “Paleta Creek (aka Seventh St. Channel)”
 - f. HSA 9.23: change “Denesa Valley” to “Dehesa Valley”
 - g. Identify reservoirs as reservoirs, not lakes; make sure all reservoirs are included and that the HU/HA/HSAs of reservoirs are correct
15. Move Table 2-3 Beneficial Uses of Coastal Waters after the Beneficial Use tables for stream systems, reservoirs, and lakes, ponds, etc. and renumber accordingly.
16. Explain special protections for BIOL.
17. Provide names of Hydrologic Unit for inland surface waters in Table 2-2.

D. Chapter 3 Water Quality Objectives

1. Reorganize Designated Water Quality Objectives into the following sections: 1) General Antidegradation Objective, 2) Ocean Waters, 3) Other Coastal Waters (Harbors, Enclosed Bays, Lagoons, Estuaries, and Stream Mouths), 4) Inland Surface Waters, and 5) Ground Waters.
2. Make the actual objectives stand out more clearly from discussions of the parameters. Consider putting such discussions in a separate section from the actual objectives.
3. Change the title of Table 3-2 to “Numerical Water Quality Objectives for Inland Surface Waters” and make sure all the objectives are in the table.
4. Change the title of Table 3-3 to “Numerical Water Quality Objectives for Ground Waters” and make sure all the objectives are in the table.
5. Add a table entitled “Numerical Water Quality Objectives for Coastal Waters” and make sure all the objectives are in the table.
6. The water quality objective for pH in inland surface waters, enclosed bays and estuaries is unclear. Reword for clarity like the pH objective for ocean waters.
7. In the water quality objective for radioactivity, change “nor” to “or.”
8. In the water quality objective for suspended and settleable solids, change “Waters shall not contain suspended and settleable solids....” to “Waters shall not contain suspended or settleable solids....”
9. Reword the biostimulatory substance water quality objective for clarity. The Basin Plan does not define standing or flowing body of water for the biostimulatory substances water quality objective. This is a point of conflict in lagoons.
10. The table under the discussion of percent sodium in the new electronic Basin Plan was copied incorrectly. Class III should say >70-75% instead of 0-75%.
11. Move the water quality objectives tables 3-2 and 3-3 to the end of the chapter. The tables are currently in the middle of the text which makes it difficult to find text which falls after the tables.

E. Chapter 4 Implementation

1. Add introductory text to Chapter 4 to accommodate incorporation of TMDLs into Basin Plan.
2. Update Basin Plan text to reflect the current requirements outlined in the recently modified NPDES municipal storm water permits (MS4 permits). Existing Basin Plan text must be

expanded to make clear that MS4 permits require dischargers to meet water quality standards in addition to reducing pollutants to the maximum extent practicable.

3. Update language regarding the NPDES construction storm water program to clarify recent permit changes and provide new information on current Phase II regulations.
4. Update Basin Plan section on Dairies to reflect the 2008 USEPA final Concentrated Animal Feeding Operation (CAFO) Regulations.
5. Update and revise Basin Plan text pertaining to the Discharges of Waste to Land to reflect new regulations under Title 27, California Code of Regulations.
6. Clarify language in Chapter 4 that incorrectly refers to waste discharge requirements (WDRs) as "permits". Correct language that refers to discharges as being "authorized" by a WDR.
7. Revise Table 4-6 in Basin Plan to include current water reclamation projects or remove table since projects keep changing.
8. Change the name of the SLIC (Spills, Leaks, Investigation, and Cleanup) Program to the SCP (Site Cleanup Program). The Site Cleanup Program (SCP) name should replace the Spills, Leaks, Investigation, and Cleanup (SLIC) name throughout the Basin Plan.
12. Update the discussion of Steam Electric Power Plants. The text should mention discharges of chlorine. Chlorine is used as a biocide that power plants use to kill marine organisms in the cooling water piping and is released to the marine environment.
13. In the section on Marinas, the first paragraph after bullets is unclear. Reword this section for clarity. (p. 4-49)
14. The section on Marinas should mention anti-fouling paint (as mentioned under the sections on Vessels and Boatyards). Alternatively, the section on vessels and marinas could be reorganized. (p. 4-49 & following)
15. Provide some indication of needs / visions / goals / plans / rationale / directions / steps for San Diego Water Board actions in the future. Some of the text in this chapter seems to simply describe what the San Diego Water Board has done / is doing without explanation or justification. (e.g., see p. 4-80 "No Numeric Effluent Limits")
16. Rework TMDL section and text.
17. Include new sections on:
 - a. Regional Priorities and how they shape work activities,
 - b. Link between land use decisions and water quality consequences,
 - c. Need to educate local agencies on this link and hold agencies responsible,

- d. Need to protect physical and biological integrity of water resources (in addition to chemical).

- 18. Add a discussion on the emphasis on beneficial use protection, not only water quality.
- 19. Update the text of the policy to reflect implementation of Federal storm water regulations.
- 20. Add missing parenthesis under National Pollutant Discharge Elimination System. It should read ("NPDES requirements" or "NPDES permits"). (p.4-8)
- 21. Add several lines of text which were accidentally dropped from the Community Sewerage Systems section (page 4-30). As shown in the excerpt below copied from the website version, the last sentence doesn't make sense because it contains fragments of two sentences:

**“Projects Involving More Than Five Family Units -
Conventional Septic Tank/Subsurface Disposal**

The above deferral of authority to the appropriate county health officer to regulate the discharge of domestic wastes will also apply when individual sewerage systems consisting of conventional septic tanks and leach fields or seepage pits would be provided to: (1) serve dwellings involving more than five family units in a single appropriate county health officers that the following conditions are met:”

The last sentence should read:

“(1) serve dwellings involving more than five family units in a single project or (2) dispose of domestic waste from commercial or industrial projects with a design flow of more than 1200 gallons per day. The deferral will apply if the project proponent demonstrates to the satisfaction of the appropriate county health officers that the following conditions are met:”

F. Chapter 5 – Plans and Policies

- 1. Change the Basin Plan wording to more accurately reflect the Enclosed Bays and Estuaries Policy wording. The Basin Plan says "The policy lists principles of management that include the State Board's desire to phase out all discharges of municipal wastewaters and industrial process waters (exclusive of cooling waters) to enclosed bays and estuaries as soon as practicable." The Bays and Estuaries Policy says "It is the policy of the State Board that the discharge of municipal wastewaters and industrial process waters (exclusive of cooling waste discharges) to enclosed bays and estuaries, other than the San Francisco Bay-Delta

system, shall be phased out at the earliest practicable date. Exceptions to this provision may be granted by a Regional Board only when the Regional Board finds that the wastewater in question would consistently be treated and discharged in such a manner that it would enhance the quality of receiving waters above that which would occur in the absence of the discharge."

2. Add a list of Basin Plan amendments with resolution numbers.

G. Chapter 6 – Surveillance, Monitoring, and Assessment

1. Rework Monitoring section and text. Include the need for regional integrated monitoring and reporting including ambient and compliance monitoring and reporting.
2. Reevaluate regulatory programs and priorities based on ambient monitoring and reporting results.
3. Add agency performance standards linked to ambient monitoring and reporting results.
4. Add a discussion on the need to monitor deep ground water basins.
5. Add language regarding the need for a comprehensive, coordinated, cost effective Monitoring and Surveillance Program.